

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BRIAN PRICE, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERSUM MATERIALS, INC.,  
GUILLERMO NOVO, JACQUES  
CROISETIÈRE, SEIFOLLAH GHASEMI,  
SUSAN C. SCHNABEL, THOMAS J.  
RIORDAN, DR. YI HYON PAIK, and  
ALEJANDRO D. WOLFF,

Defendants.

Case No. 1:19-cv-00427-LPS

**PLAINTIFF’S NOTICE OF VOLUNTARY DISMISSAL**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), plaintiff Brian Price (“Plaintiff”) hereby voluntarily dismisses the above-captioned action (the “Action”) with prejudice as to Plaintiff only and without prejudice as to all others similarly situated. Defendants have filed neither an answer nor a motion for summary judgment in the Action, and no class has been certified. Plaintiff’s dismissal of the Action is therefore effective upon the filing of this notice.

Dated: September 24, 2019

Respectfully submitted,

**FARUQI & FARUQI, LLP**

**OF COUNSEL:**

**FARUQI & FARUQI, LLP**  
Nadeem Faruqi  
James M. Wilson, Jr.  
685 Third Avenue, 26<sup>th</sup> Floor  
New York, NY 10017

By: /s/ Michael Van Gorder  
Michael Van Gorder (#6214)  
3828 Kennett Pike, Suite 201  
Wilmington, DE 19807  
Tel.: (302) 482-3182  
Email: mvangorder@faruqilaw.com

Tel.: (212) 983-9330  
Fax: (212) 983-9331  
Email: nfaruqi@faruqilaw.com  
jwilson@faruqilaw.com

*Counsel for Plaintiff*

*Counsel for Plaintiff*